

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

| | | |
|------------------------|---|--------------------------------------|
| Shawn C. Northrup |) | Case No.: |
| |) | |
| Plaintiff, |) | Judge: |
| |) | |
| v. |) | <u>RULE 26 DISCLOSURES OF</u> |
| |) | <u>PLAINTIFF</u> |
| City of Toledo, et al. |) | |
| |) | [Daniel T. Ellis (0038555)] |
| |) | |
| |) | LYDY & MOAN, LTD. |
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| |) | |

Plaintiff, Shawn Northrup (“Northrup” or “Plaintiff”), by and through his attorney Daniel T. Ellis, pursuant to Federal Rule of Civil Procedure 26(a), make his initial disclosures as required.

I. Rule 26(a)1(A)(i)

1. Shawn Northrup, 111 Dulton Drive, Toledo, OH 43615; circumstances and facts of the incident;
2. Denise Northrup, 111 Dulton Drive, Toledo, OH 43615; circumstances and facts of the incident;
3. Sydney Northrup, 111 Dulton Drive, Toledo, OH 43615; circumstances and facts of the incident;
4. Zalas Wolfgang, 101 Dulton Drive, Toledo, OH 43615;
5. Allen Rose, 442 Hayes Road, Toledo, OH 43615, circumstances and facts of incident;

6. Witnesses and Individuals living along Hayes road that observed the incident;
7. Officer D. Bright, Toledo Police Department, 525 North Erie St., Toledo, OH 43624;
8. Officer Donald Comes, Toledo Police Department, 525 North Erie St., Toledo, OH 43624;
9. Sergeant Daniel Ray, Toledo Police Department, 525 North Erie St., Toledo, OH 43624;
10. City of Toledo employees and administrators including Mayor, Prosecutor, and others authorizing and implementing policies followed by the City of Toledo, Police Division;
11. City of Toledo, Police Division, employees and administrators including Chief of Police, supervisors, training officers, and co-workers regarding polices, operation, training, enforcement and implementation of polices, laws of Ohio and City of Toledo, and the manner in which its police officers conduct themselves;
12. All persons named in the Rule 26 disclosures filed by defendants; and
13. Any additional witnesses who may be identified during discovery and including but not limited to fact witnesses who may be discovered, expert witnesses that may be disclosed and other witnesses who may exit and be discovered.

II. Rule 26(a)1(A)(ii)

1. Photos of injuries to wrists;
2. T-Shirt;
3. Drivers license;
4. Dog, Gizmo (Yorkshire Terrier);
5. Audio CD; and
6. Firearm and holster.

III. Rule 26(a)1(A)(iii)

Replacement of Driver's license was \$8.00; parking receipts are \$13.50; \$1,400 in attorney fees and costs; \$10,000 for pain, suffering and injuries to wrists; \$100,000 for violation of constitutional rights; and \$100,000 punitive damages for unlawful conduct; malicious prosecution and excess force.

IV. Rule 26(a)1(A)(iv)

Not Applicable.

Plaintiff, Shawn Northrup reserves his right to supplement these disclosures during the discovery process and consistent with the Orders of the Court.

Respectively submitted,

/s/ Daniel T. Ellis
Daniel T. Ellis (0038555)

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Attorneys for Plaintiff
Shawn Northrup

CERTIFICATE OF SERVICE

This is to certify that the foregoing was filed electronically with the Court on August 28, 2012. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: /s/ Daniel T. Ellis
Daniel T. Ellis (0038555)

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